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September 12, 2008

BY CM/ECF FILING

The Honorable Vincent J. Poppiti
Blank Rome, LLP
1201 Market Street, Suite 800
Wilmington, DE 19801

Re: *Honeywell International, Inc., et al. v. Apple Computer, Inc., et al.*
C.A. No. 04-1338-JJF (Consolidated)

Dear Judge Poppiti:

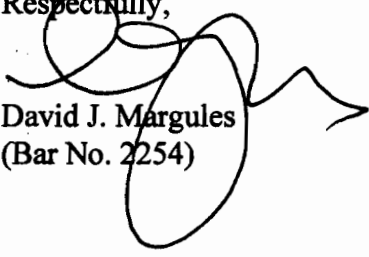
Honeywell has requested formal mediation with Defendants Citizen Watch Co., Ltd. and Citizen Displays Co., Ltd. (collectively "Citizen") before Judge Thyng. As always, Citizen welcomes a discussion with Honeywell regarding resolution of this case, but formal mediation with Judge Thyng is both unnecessary and inappropriate at this time.

On April 25, 2008, more than four months ago, Citizen moved for summary judgment. After two and a half years of litigation, Honeywell has not even attempted to establish a case of inducement against Citizen, failing to cite any inducing acts by Citizen or the specific intent required for inducement. Honeywell's response is to raise irrelevant "questions of fact" about the possibility that Matsushita might, some time in the future, assert it has a right of indemnification against Citizen— a right Matsushita has never claimed it has. In the face of our summary judgment motion, Honeywell's request for mediation appears to be nothing more than an effort to delay the date of reckoning.

Honeywell offers nothing to justify mediation other than the threat that Citizen may be forced to litigate Honeywell's baseless claim with the rest of the defendants through a combined trial, if Citizen is unsuccessful on its summary judgment motion. Given the strength of Citizen's motion and the small amount of damages at issue, Citizen opposes incurring the additional delay and expense of formal mediation before Judge Thyng to resolve this matter.

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Respectfully,



David J. Margules
(Bar No. 2254)

cc: Clerk of the Court (by CM/ECF)
All Counsel of Record (by CM/ECF)